



MITCHELL SILBERBERG & KNUPP LLP  
A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

Eleanor M. Lackman  
Partner  
(212) 878-4890 Phone  
(917) 546-7675 Fax  
eml@msk.com

July 19, 2022

**VIA ECF ONLY**

The Honorable Gregory H. Woods  
United States District Court  
Southern District of New York  
500 Pearl Street, Courtroom 12C  
New York, New York 10007-1312

Re: McGucken v. Shutterstock, Inc., et al., No. 1:22-cv-00905-GHW

Dear Judge Woods:

This firm represents defendant Shutterstock, Inc. ("Shutterstock") in connection with the above-captioned action.

Pursuant to the teleconference held on July 13, 2022, Your Honor's Orders dated July 14, 2022 (ECF Doc. No. 14) and July 19, 2022 (ECF Doc. No. 39) enclosed is: (1) a revised blackline of the proposed protective order (compared to the Court's form Protective Order) including language regarding how documents designated as "Highly Confidential – Attorneys' Eyes Only" in other proceedings will be handled; and (2) a clean copy of the same for endorsement.

We thank the Court for its attention to this matter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'EML', followed by a stylized flourish.

Eleanor M. Lackman

EML/el  
Enclosures